

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

May 30 20 18
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CHARLES ROLAND CHEATHAM,
a/k/a "Chi-Chi,"
2. LUIS PEREZ-CRUZ,
3. DOMINQUE E. JIMERSON,
a/k/a "Benjamin S. Smith,"
4. DONNIE P. CHEATHAM,
5. TIFFANY LATRICE YOUNGER,
6. LAMONT JEFFREY REYNOLDS,
a/k/a "L,"
7. MICHAEL LA VON DAVIS,
8. NAKITA MARIE CANNADY,
9. EDDRICK JEROME BAKER,
10. ALONZO WILLIAMS BAGGETT,
11. MARTIN JEFFREY BANKS,
12. MARQUS JAMAL JONES,
13. ADAM MICHAEL SMITH,
14. NATHANIEL WELLS,
15. RASHEED CHAFA ECHOLS,
16. MARCUS JAMES HALL,
17. WAUNIKA LYNETTE WALKER,
a/k/a "Granny,"
18. LARRY DOBBIE HOLLOWAY,
19. MICHAEL D. SAFFORD, a/k/a "Sweet,"

NO. **CR18-131 RAJ**

INDICTMENT

20. BRANDEN LEI BARNETT, a/k/a "H2O"
21. CARLOS DEMARK DENNIS,
22. ASA D. HARRIS,
23. BRADFORD STREET, and
24. JEROME RAY WILSON.

Defendants.

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, but within the past five years, and continuing until on or about May 30, 2018, in King, Snohomish, and Pierce Counties, within the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, LUIS PEREZ-CRUZ, DOMINQUE E. JIMERSON, DONNIE P. CHEATHAM, TIFFANY LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LA VON DAVIS, NAKITA MARIE CANNADY, EDDRICK JEROME BAKER, ALONZO WILLIAMS BAGGETT, MARTIN JEFFREY BANKS, MARQUS JAMAL JONES, ADAM MICHAEL SMITH, NATHANIEL WELLS, RASHEED CHAFA ECHOLS, MARCUS JAMES HALL, WAUNIKA LYNETTE WALKER, LARRY DOBBIE HOLLOWAY, MICHAEL D. SAFFORD, BRANDEN LEI BARNETT, CARLOS DEMARK DENNIS, ASA D. HARRIS, BRADFORD STREET, JEROME RAY WILSON, and others known and unknown, including conspirators charged in a separate indictment returned on this same day under the caption United States v. Michael Scott Morgan Jr., et al., did knowingly and intentionally conspire to distribute substances controlled under Title 21, United States Code, Section 812, Schedules I and II, including cocaine, heroin, methamphetamine, marijuana, and oxycodone, contrary to the provisions of Title 21, United States Code.

Specific Quantity Allegations as to Cocaine

With respect to Defendants CHARLES ROLAND CHEATHAM, LUIS PEREZ-CRUZ, TIFFANY LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LA VON DAVIS, MARTIN JEFFREY BANKS, MARCUS JAMES HALL, LARRY DOBBIE HOLLOWAY, MICHAEL D. SAFFORD, and CARLOS DEMARK DENNIS, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved five kilograms or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Specific Quantity Allegations as to Cocaine

With respect to Defendants DOMINIQUE E. JIMERSON, EDDRICK JEROME BAKER, DONNIE P. CHEATHAM, ALONZO WILLIAMS BAGGETT, MARQUS JAMAL JONES, ADAM MICHAEL SMITH, BRANDEN LEI BARNETT, BRADFORD STREET, and JEROME RAY WILSON, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved five hundred grams or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

Specific Quantity Allegations as to Heroin

With respect to Defendants CHARLES ROLAND CHEATHAM, MICHAEL LA VON DAVIS, NAKITA MARIE CANNADY, NATHANIEL WELLS, RASHEED CHAFA ECHOLS, MARCUS JAMES HALL, and WAUNIKA LYNETTE WALKER, their conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Specific Quantity Allegations as to Methamphetamine

With respect to Defendants CHARLES ROLAND CHEATHAM, MICHAEL LA VON DAVIS, and NAKITA MARIE CANNADY, their conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

COUNT 2

(Possession of Cocaine with Intent to Distribute)

On or about November 4, 2017, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and DOMINQUE E. JIMERSON knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

(Possession of Cocaine with Intent to Distribute)

On or about November 8, 2017, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, DONNIE P. CHEATHAM, TIFFANY LATRICE YOUNGER, and LAMONT JEFFREY REYNOLDS knowingly and intentionally possessed, and did aid and abet the possession

1 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
2 Code, Section 812.

3 The Grand Jury further alleges that this offense was committed during and in
4 furtherance of the conspiracy charged in Count 1, above.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
6 and Title 18, United States Code, Section 2.

7 **COUNT 4**

8 **(Possession of Cocaine and Heroin with Intent to Distribute)**

9 On or about November 9, 2017, in Pierce County, Washington, in the Western
10 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MICHAEL
11 LA VON DAVIS, NAKITA MARIE CANNADY, and others known and unknown,
12 knowingly and intentionally possessed, and did aid and abet the possession of, with intent
13 to distribute, cocaine and heroin, substances controlled under Title 21, United States
14 Code, Section 812.

15 The Grand Jury further alleges that this offense involved five kilograms or more of
16 a mixture or substance containing a detectable amount of cocaine, and one kilogram or
17 more of a mixture or substance containing a detectable amount of heroin.

18 The Grand Jury further alleges that this offense was committed during and in
19 furtherance of the conspiracy charged in Count 1, above.

20 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
21 and Title 18, United States Code, Section 2.

22 **COUNT 5**

23 **(Possession of Cocaine with Intent to Distribute)**

24 On or about November 11, 2017, in Burien, Washington, in the Western District
25 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and EDDRICK
26 JEROME BAKER knowingly and intentionally possessed, and did aid and abet the
27 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
28 United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 6**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about November 13, 2017, in King County, Washington, in the Western
8 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
9 ALONZO WILLAMS BAGGETT knowingly and intentionally possessed, and did aid
10 and abet the possession of, with intent to distribute, cocaine, a substance controlled under
11 Title 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense involved 500 grams or more of a
13 mixture or substance containing cocaine.

14 The Grand Jury further alleges that this offense was committed during and in
15 furtherance of the conspiracy charged in Count 1, above.

16 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
17 and Title 18, United States Code, Section 2.

18 **COUNT 7**

19 **(Possession of Cocaine with Intent to Distribute)**

20 On or about November 21, 2017, in King County, Washington, in the Western
21 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
22 MARTIN JEFFREY BANKS knowingly and intentionally possessed, and did aid and
23 abet the possession of, with intent to distribute, cocaine, a substance controlled under
24 Title 21, United States Code, Section 812.

25 The Grand Jury further alleges that this offense involved 500 grams or more of a
26 mixture or substance containing cocaine.

27 The Grand Jury further alleges that this offense was committed during and in
28 furtherance of the conspiracy charged in Count 1, above.

1 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
2 and Title 18, United States Code, Section 2.

3 **COUNT 8**

4 **(Possession of Cocaine with Intent to Distribute)**

5 On or about November 27, 2017, in King County, Washington, in the Western
6 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MARQUS
7 JAMAL JONES, and ADAM MICHAEL SMITH knowingly and intentionally possessed,
8 and did aid and abet the possession of, with intent to distribute, cocaine, a substance
9 controlled under Title 21, United States Code, Section 812.

10 The Grand Jury further alleges that this offense was committed during and in
11 furtherance of the conspiracy charged in Count 1, above.

12 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
13 and Title 18, United States Code, Section 2.

14 **COUNT 9**

15 **(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

16 On or about November 27, 2017, in King County, Washington, within the Western
17 District of Washington, ADAM MICHAEL SMITH, during and in relation to the drug
18 trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count
19 1 and *Possession of Cocaine with Intent to Distribute* as charged in Count 8, above, did
20 knowingly and intentionally carry, and did aid and abet the carrying of, a firearm, to wit,
21 one Sig Sauer Model P232 .380 semiautomatic pistol, bearing serial number S244271.

22 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

23 **COUNT 10**

24 **(Possession of Cocaine with Intent to Distribute)**

25 On or about November 30, 2017, in Tukwila, Washington, in the Western District
26 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and EDDRICK
27 JEROME BAKER knowingly and intentionally possessed, and did aid and abet the
28

1 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
2 United States Code, Section 812.

3 The Grand Jury further alleges that this offense was committed during and in
4 furtherance of the conspiracy charged in Count 1, above.

5 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
6 and Title 18, United States Code, Section 2.

7 **COUNT 11**

8 **(Possession of Heroin with Intent to Distribute)**

9 On or about January 7, 2018, at Lewis County, Washington, within the Western
10 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, MICHAEL
11 LA VON DAVIS, NAKITA MARIE CANNADY, and NATHANIEL WELLS
12 knowingly and intentionally possessed, and did aid and abet the possession of, with intent
13 to distribute, heroin, a substance controlled under Title 21, United States Code, Section
14 812.

15 The Grand Jury further alleges that this offense involved one (1) kilogram or more
16 of a mixture or substance containing heroin.

17 The Grand Jury further alleges that this offense was committed during and in
18 furtherance of the conspiracy charged in Count 1, above.

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)
20 and Title 18, United States Code, Section 2.

21 **COUNT 12**

22 **(Possession of Cocaine with Intent to Distribute)**

23 On or about February 15, 2018, in King County, Washington, within the Western
24 District of Washington, and elsewhere, MICHAEL LA VON DAVIS and RASHEED
25 CHAFA ECHOLS knowingly and intentionally possessed, and did aid and abet the
26 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
27 United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 13**

6 **(Possession of Heroin with Intent to Distribute)**

7 On or about February 16, 2018, in Tukwila, Washington, within the
8 Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM
9 and MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and
10 abet the possession of, with intent to distribute, heroin, a substance controlled under Title
11 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 14**

17 **(Possession of Heroin with Intent to Distribute)**

18 On or about February 18, 2018, in Seattle, Washington, within the Western
19 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
20 MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and abet
21 the possession of, with intent to distribute, heroin, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

COUNT 15

(Possession of Heroin with Intent to Distribute)

On or about February 19, 2018, in Pierce County, Washington, within the Western District of Washington, and elsewhere, MICHAEL LA VON DAVIS and WAUNIKA LYNETTE WALKER knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, heroin, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved one kilogram or more of a mixture or substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 16

(Possession of Cocaine with Intent to Distribute)

On or about February 20, 2018, in Renton, Washington, within the Western District of Washington, and elsewhere, LARRY DOBBIE HOLLOWAY and others known and unknown, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 17

(Possession of Cocaine and Heroin with Intent to Distribute)

On or about February 20, 2018, in Pierce County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and

1 ALONZO WILLAMS BAGGETT knowingly and intentionally possessed, and did aid
2 and abet the possession of, with intent to distribute, cocaine and heroin, substances
3 controlled under Title 21, United States Code, Section 812.

4 The Grand Jury further alleges that this offense involved 100 grams or more of a
5 mixture or substance containing heroin.

6 The Grand Jury further alleges that this offense was committed during and in
7 furtherance of the conspiracy charged in Count 1, above.

8 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
9 and Title 18, United States Code, Section 2.

10 **COUNT 18**

11 **(Possession with Intent to Distribute Cocaine)**

12 On or about February 22, 2018, in Pierce County, Washington, within the Western
13 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and
14 MARCUS JAMES HALL knowingly and intentionally possessed, and did aid and abet
15 the possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
16 United States Code, Section 812.

17 The Grand Jury further alleges that this offense was committed during and in
18 furtherance of the conspiracy charged in Count 1, above.

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
20 and Title 18, United States Code, Section 2.

21 **COUNT 19**

22 **(Possession of Cocaine with Intent to Distribute)**

23 On or about February 22, 2018, in King County, Washington, in the Western
24 District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, TIFFANY
25 YOUNGER, and MICHAEL D. SAFFORD knowingly and intentionally possessed, and
26 did aid and abet the possession of, with intent to distribute, cocaine, a substance
27 controlled under Title 21, United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 20**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about February 23, 2018, in Tukwila, Washington, in the Western District
8 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, BRANDEN LEI
9 BARNETT and LAMONT JEFFREY REYNOLDS knowingly and intentionally
10 possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a
11 substance controlled under Title 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 21**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about February 26, 2018, in King County, Washington, within the Western
19 District of Washington, and elsewhere, MICHAEL LA VON DAVIS and RASHEED
20 CHAFA ECHOLS knowingly and intentionally possessed, and did aid and abet the
21 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

COUNT 22

(Possession of Cocaine with Intent to Distribute)

On or about February 27, 2018, in Seattle, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and others known and unknown, knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 23

(Possession of Cocaine with Intent to Distribute)

On or about February 28, 2018, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and CARLOS DEMARK DENNIS knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 24

(Possession of Heroin with Intent to Distribute)

On or about February 28, 2018, in King County, Washington, within the Western District of Washington, and elsewhere, MICHAEL LA VON DAVIS and WAUNIKA LYNETTE WALKER knowingly and intentionally possessed, and did aid and abet the

1 possession of, with intent to distribute, heroin, a substance controlled under Title 21,
2 United States Code, Section 812.

3 The Grand Jury further alleges that this offense involved 100 grams or more of a
4 mixture or substance containing a detectable amount of heroin.

5 The Grand Jury further alleges that this offense was committed during and in
6 furtherance of the conspiracy charged in Count 1, above.

7 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
8 and Title 18, United States Code, Section 2.

9 **COUNT 25**

10 **(Possession of Cocaine with Intent to Distribute)**

11 On or about March 2, 2018, in King County, Washington, in the Western District
12 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and DOMINQUE E.
13 JIMERSON, knowingly and intentionally possessed, and did aid and abet the possession
14 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
15 Code, Section 812.

16 The Grand Jury further alleges that this offense involved 500 grams or more of a
17 mixture or substance containing cocaine.

18 The Grand Jury further alleges that this offense was committed during and in
19 furtherance of the conspiracy charged in Count 1, above.

20 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
21 and Title 18, United States Code, Section 2.

22 **COUNT 26**

23 **(Possession of Cocaine with Intent to Distribute)**

24 On or about March 2, 2018, in Renton, Washington, within the Western District of
25 Washington, and elsewhere, CHARLES ROLAND CHEATHAM and LARRY DOBBIE
26 HOLLOWAY knowingly and intentionally possessed, and did aid and abet the
27 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
28 United States Code, Section 812.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
4 and Title 18, United States Code, Section 2.

5 **COUNT 27**

6 **(Possession of Heroin with Intent to Distribute)**

7 On or about March 3, 2018, in King County, Washington, within the Western
8 District of Washington, and elsewhere, MICHAEL LA VON DAVIS and ASA D.
9 HARRIS knowingly and intentionally possessed, and did aid and abet the possession of,
10 with intent to distribute, heroin, a substance controlled under Title 21, United States
11 Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 28**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about March 4, 2018, in King County, Washington, in the Western District
19 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and BRADFORD
20 STREET knowingly and intentionally possessed, and did aid and abet the possession of,
21 with intent to distribute, cocaine, a substance controlled under Title 21, United States
22 Code, Section 812.

23 The Grand Jury further alleges that this offense involved 500 grams or more of a
24 mixture or substance containing cocaine.

25 The Grand Jury further alleges that this offense was committed during and in
26 furtherance of the conspiracy charged in Count 1, above.

27 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)
28 and Title 18, United States Code, Section 2.

COUNT 29

(Possession of Cocaine with Intent to Distribute)

On or about March 6, 2018, in Tukwila, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and MARTIN JEFFREY BANKS knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 30

(Possession of Cocaine with Intent to Distribute)

On or about March 8, 2018, in King County, Washington, in the Western District of Washington, and elsewhere, CHARLES ROLAND CHEATHAM, JEROME RAY WILSON, and MICHAEL D. SAFFORD knowingly and intentionally possessed, and did aid and abet the possession of, with intent to distribute, cocaine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 31

(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about March 8, 2018, in King County, Washington, within the Western District of Washington, JEROME RAY WILSON, during and in relation to the drug trafficking crimes of *Conspiracy to Distribute Controlled Substances* as charged in Count 1 and *Possession of Cocaine with Intent to Distribute* as charged in Count 30 above, did

1 knowingly and intentionally carry, and did aid and abet the carrying of, a firearm, to wit,
2 two Ruger SR9C 9mm semiautomatic pistols, bearing serial numbers 366-67744 and
3 336-88308.

4 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

5 **COUNT 32**

6 **(Possession of Cocaine with Intent to Distribute)**

7 On or about March 10, 2018, in King County, Washington, in the Western District
8 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and others known
9 and unknown, knowingly and intentionally possessed, and did aid and abet the possession
10 of, with intent to distribute, cocaine, a substance controlled under Title 21, United States
11 Code, Section 812.

12 The Grand Jury further alleges that this offense was committed during and in
13 furtherance of the conspiracy charged in Count 1, above.

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
15 and Title 18, United States Code, Section 2.

16 **COUNT 33**

17 **(Possession of Cocaine with Intent to Distribute)**

18 On or about March 14, 2018, in King County, Washington, in the Western District
19 of Washington, and elsewhere, CHARLES ROLAND CHEATHAM and CARLOS
20 DEMARK DENNIS knowingly and intentionally possessed, and did aid and abet the
21 possession of, with intent to distribute, cocaine, a substance controlled under Title 21,
22 United States Code, Section 812.

23 The Grand Jury further alleges that this offense was committed during and in
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
26 and Title 18, United States Code, Section 2.

ASSET FORFEITURE ALLEGATION**Counts 1–8, 10–30, and 32–33**

The allegations contained in Counts 1–8, 10–30, and 32–33 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the offenses alleged in Counts 1–8, 10–30, and 32–33 of this Indictment, the defendants, CHARLES ROLAND CHEATHAM, LUIS PEREZ-CRUZ, DOMINQUE E. JIMERSON, DONNIE P. CHEATHAM, TIFFANY LATRICE YOUNGER, LAMONT JEFFREY REYNOLDS, MICHAEL LA VON DAVIS, NAKITA MARIE CANNADY, EDDRICK JEROME BAKER, ALONZO WILLIAMS BAGGETT, MARTIN JEFFREY BANKS, MARQUS JAMAL JONES, ADAM MICHAEL SMITH, NATHANIEL WELLS, RASHEED CHAFA ECHOLS, MARCUS JAMES HALL, WAUNIKA LYNETTE WALKER, LARRY DOBBIE HOLLOWAY, MICHAEL D. SAFFORD, BRANDEN LEI BARNETT, CARLOS DEMARK DENNIS, ASA D. HARRIS, BRADFORD STREET, and JEROME RAY WILSON, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of that offense, and also shall forfeit any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, that offense, including but not limited to the following:

- a. Approximately \$100,000 in U.S. currency, seized on or about January 7, 2018, from NAKITA MARIE CANNADY and NATHANIEL WELLS;
- b. Approximately \$1,256 in U.S. currency, seized on or about January 7, 2018, from NATHANIEL WELLS; and
- c. A judgment for a sum of money representing any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of that offense, and any of the defendant's property used, or intended to

1 be used, in any manner or part, to commit, or to facilitate the commission of,
2 that offense.

3 Counts 9 and 31

4 The allegations contained in Counts 9 and 31 of this Indictment are hereby
5 realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to
6 Title 18, United States Code, Section 924(d) and Title 28, United States Code,
7 Section 2461(c).

8 Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United
9 States Code, Section 2461(c), upon conviction of either of the offenses charged in Counts
10 9 and 31 of this Indictment, the defendants, ADAM MICHAEL SMITH and JEROME
11 RAY WILSON, shall forfeit to the United States any firearms or ammunition involved in
12 or used in any knowing violation of Title 18, United States Code, Section 924, including
13 but not limited to the following:

- 14 a. One Ruger SR9C 9mm semiautomatic pistol, bearing serial number 366-
15 67744; and
16 b. One Ruger SR9C 9mm semiautomatic pistol, bearing serial number 336-
17 88308.

18 Substitute Assets

19 If any of the above-described forfeitable property, as a result of any act or
20 omission of the defendants,

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been placed beyond the jurisdiction of the Court;
24 d. has been substantially diminished in value; or
25 e. has been commingled with other property which cannot be divided without
26 difficulty;
27
28

1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p) and Title 28, United States Code, Section 2461(c), to seek the forfeiture of any
3 other property of the defendants, up to the value of the above-described forfeitable
4 property.

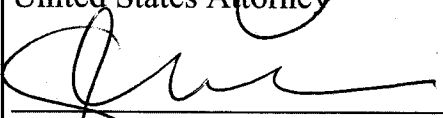
5
6 A TRUE BILL:

7 DATED: 5-30-2018

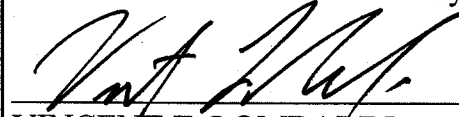
8 *Signature of the Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States*

11 FOREPERSON

12 
13 ANNETTE L. HAYES
14 United States Attorney

15 
16 SARAH Y. VOGEL
17 Assistant United States Attorney

18 
19 ERIN H. BECKER
20 Assistant United States Attorney

21 
22 VINCENT T. LOMBARDI
23 Assistant United States Attorney

24 
25 NICHOLAS MANHEIM
26 Assistant United States Attorney